EXHIBIT E

ENGINEERING STATEMENT
IN SUPPORT OF OPPOSITION TO
WKMG-DT, ORLANDO, FLORIDA
ELECTION OF CHANNEL 15
ON BEHALF OF
WATERMAN BROADCASTING CORP. OF FLORIDA
LICENSEE OF
WBBH-DT, FORT MYERS, FLORIDA

MARCH 2005

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 15th day of March, 2005.

Notary Public

My Commission Expires: 2/28/2008

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Martin R. Doczkat being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer of the Pennsylvania State University, and is a staff engineer at Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Martin R. Doczkat

Subscribed and sworn to before me this 15th day of March, 2005.

Notary Public

My Commission Expires: 2/28/2008

CAROLYN C. LYONS NOTARY PUBLIC DISTRICT OF COLUMBIA

This engineering statement is prepared on behalf of Waterman Broadcasting Corp. of Florida, licensee of WBBH-DT, Fort Myers, Florida, in support of an opposition to WKMG-DT's submission requesting authority to operate on Channel 15. WKMG-DT is licensed to Orlando, Florida.

History

WBBH-DT is licensed to operate on Channel 15 with 1000 kW maximum ERP at a HAAT of 453.9 meters (FCC File No. BLCDT-20030620AAA).

WKMG-DT certified in FCC Form 381 to operate pursuant to its authorized DTV facility (FCC File No. BLCDT-20010515ABB). In its submission, WKMG-DT specified Channel 15 in FCC Form 382. Channel 15 was not and has not been authorized to WKMG-DT.

The following provides an assessment using Longley-Rice of the impact of WKMG-DT's proposed Channel 15 operation to the licensed facility of WBBH-DT.

Interference Analysis

WKMG-DT is licensed to operate on Channel 58 with a maximum visual horizontal effective radiated power ("ERP") of 1000 kW directional at a height above average terrain ("HAAT") of 516 meters (FCC File No. BLCDT-20010515ABB). WKMG-DT certified it would build DTV facilities pursuant to the aforementioned DTV licensed facility in FCC Form 381. WKMG-DT elected Channel 15 in FCC Form 382. Accordingly, WKMG-DT proposes to construct DTV facilities on Channel 15 that are identical with its current DTV operation on Channel 58. For the following Channel 15 Longley-Rice analysis for WKMG-DT, the following other parameters (channel and ERP) have been used as abstracted by CDBS.

WKMG-TV DT LIC	C 58	1000.000	525.0 m	28°36'35"	BLCDT20010515ABB	
ORLANDO, FL		3 D	516.0 m	81°03'35"	71293	566919
POST-NEWSWEEK STATIONS, ORLANDO, INC.					DIE	19089

A map of the interference caused by the proposed WKMG-DT on Channel 15 to the authorized WBBH-DT facility is included as Exhibit E-1. The WKMG-DT operation analyzed the same HAAT and utilizes a directional antenna and antenna azimuth pattern used in the DTV license and is included for convenience as Exhibit E-2. The coordinates for the proposed WKMG-DT Channel 15 operation are the same as used in the DTV license and are as follows:

North Latitude: 28° 36' 35"

West Longitude: 81° 03' 35"

(NAD-27)

Dipole Factor

WKMG-DT operates on Channel 58 with 1000 kW directional. Operation on Channel 15 requires a dipole factor[1] adjustment, therefore, a reduction in ERP at the radio horizon will be necessary. This will result in an ERP of 422.7 kW directional.

Longley-Rice Analysis

A study of the predicted interference caused by the proposed WKMG-DT service has been performed using a version of the Longley-Rice program as described in OET Bulletin No. 69 (July 2, 1997) and the Public Notice, "Additional Application Processing Guidelines for Digital Television (DTV)" (August 1998) using the following parameters:

Channel	Call	City/State	ERP kW	HAAT m	RCAMSL m
15	WKMG-DT	Orlando, FL	422.7 DA	516	525

The FCC's FORTRAN-77 code was modified only to the extent necessary (primarily input/output handling) for the program to run on a Windows 98/Intel platform. Comparison of service/interference areas and populations indicates that this model closely matches the FCC's

[1]Table II OET Bulletin 69.

evaluation program. Best efforts have been made to use data and calculations identical to the FCC's program. Any slight differences are attributable to compiler, operating system and/or processor characteristics. The effect of any variance in calculated population values versus the FCC's program is minimized when differencing a given model's results, such as calculating new interference as total interference less baseline interference. Any variance effect is further reduced when using ratios of calculated population values such as measuring the incremental population affected as a percent of the total population served. The model employs the Longley-Rice propagation methodology and evaluates in grid cells of approximately 4 km^2 using 3-second terrain data sampled approximately every 1.0 km at one degree azimuth intervals with 2000 Census centroids.

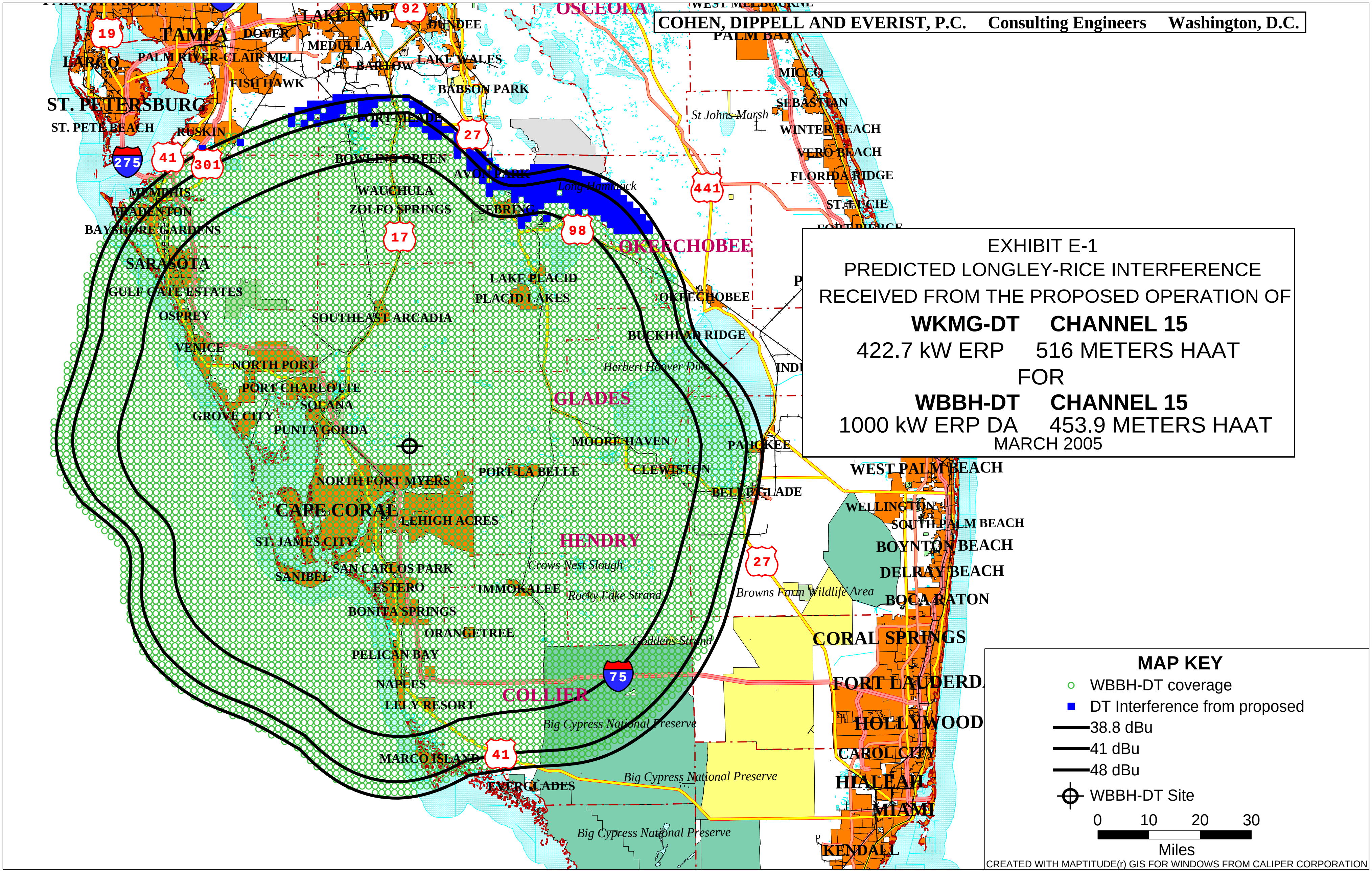
Stations were selected according to the FCC Public Notice dated August 10, 1998 and entitled, "Additional Application Processing Guidelines for Digital Television", which outlines the station selection criteria "culling distances" for considering potential interference scenarios.

The above only considers all outstanding construction permits and licensed operations abstracted from the FCC engineering data base dated March 15, 2005.

Allocation Situation

In accordance with the Report and Order in MB Docket 03-15, the proposed operation causes more than 0.1% new interference to WBBH-DT despite the fact that an interference agreement has not been reached. Specifically, the proposed WKMG-DT operation causes 1.36% new interference (see Table I) to the certified licensed DTV facility, WBBH-DT (FCC File No. BLCDT-20030620AAA). Therefore, the proposed operation is not in compliance with the *Report and Order* in ET Docket 03-15 adopted August 4, 2004,[2] and must be dismissed.

[2] See Paragraph 46.


COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.
EXHIBIT E-1
PREDICTED LONGLEY-RICE INTERFERENCE
RECEIVED FROM THE PROPOSED OPERATION OF
WKMG-DT CHANNEL 15
422.7 kW ERP 516 METERS HAAT
FOR
WBBH-DT CHANNEL 15
1000 kW ERP DA 453.9 METERS HAAT
MARCH 2005
MAP KEY
WBBH-DT coverage
DT Interference from proposed
38.8 dBu
41 dBu
48 dBu
WBBH-DT Site
0 10 20 30
Miles
CREATED WITH MAPTITUDE(r) GIS FOR WINDOWS FROM CALIPER CORPORATION
OSCEOLA
OKEECHOBEE
GLADES
HENDRY
COLLIER
TAMPA
LAKELAND
DOVER
DUNDEE
MEDULLA
LARGO
PALM RIVER-CLAIR MEL
BARTOW
LAKE WALES
FISH HAWK
BABSON PARK
ST. PETERSBURG
ST. PETE BEACH
RUSKIN
FORT MEADE
BOWLING GREEN
AVON PARK
WAUCHULA
ZOLFO SPRINGS
SEBRING
MEMPHIS
BRADENTON
BAYSHORE GARDENS
SARASOTA
GULF GATE ESTATES
OSPREY
LAKE PLACID
PLACID LAKES
SOUTHEAST ARCADIA
OKEECHOBEE
BUCKHEAD RIDGE
VENICE
NORTH PORT
PORT CHARLOTTE
SOLANA
GROVE CITY
PUNTA GORDA
MOORE HAVEN
PAHOKEE
CLEWISTON
PORT LA BELLE
NORTH FORT MYERS
BELLE GLADE
CAPE CORAL
LEHIGH ACRES
ST. JAMES CITY
SANIBEL
SAN CARLOS PARK
ESTERO
IMMOKALEE
BONITA SPRINGS
ORANGETREE
PELICAN BAY
NAPLES
LELY RESORT
MARCO ISLAND
EVERGLADES
PALM BAY
MICCO
SEBASTIAN
WINTER BEACH
VERO BEACH
FLORIDA RIDGE
ST. LUCIE
WEST PALM BEACH
WELLINGTON
SOUTH PALM BEACH
BOYNTON BEACH
DELRAY BEACH
BOCA RATON
CORAL SPRINGS
FORT LAUDERD
HOLLYWOOD
CAROL CITY
HIALEAH
MIAMI
KENDALL
St Johns Marsh
Long Hammock
Herbert Hoover Dike
Crows Nest Slough
Rocky Lake Strand
Browns Farm Wildlife Area
Gaddens Strand
Big Cypress National Preserve
19
92
275
41
301
27
17
98
441
75

COHEN, DIPPELL AND EVERIST, P. C.

EXHIBIT E-2
LICENSED DIRECTIONAL
AZIMUTH PATTERN FOR
WKMG-DT, CHANNEL 58, ORLANDO, FL
(FCC FILE NO. BLCDT-20010515ABB)

STATION: WKMG-TV (channel 58) in ORLANDO, FL
TYPE: DT - LIC
FILE NO: BLCDT - 20010515ABB
REF AZ: 0
ERP: 1000

AZIMUTH	FIELD
0	0.759
10	0.669
20	0.638
30	0.638
40	0.669
50	0.697
60	0.649
70	0.635
80	0.649
90	0.697
100	0.768
110	0.809
120	0.779
130	0.731
140	0.759
150	0.859
160	0.961
170	1
180	0.941
190	0.832
200	0.783
210	0.828
220	0.897
230	0.939
240	0.946
250	0.942
260	0.946
270	0.939
280	0.857
290	0.828
300	0.783
310	0.832
320	0.941
330	1
340	0.961
350	0.859

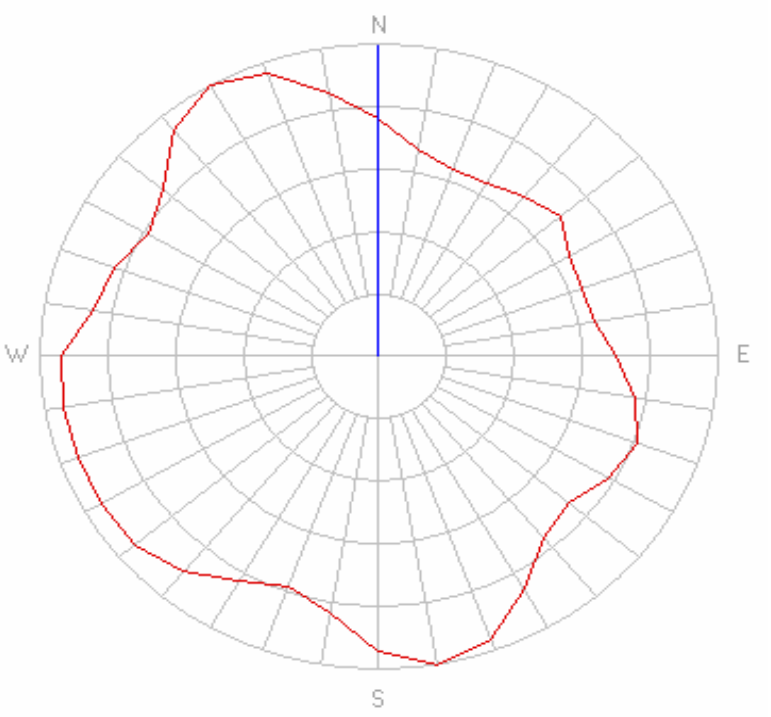


TABLE I
PREDICTED LONGLEY-RICE COVERAGE FOR THE LICENSED
OPERATION OF WBBH-DT INCLUDING INTERFERENCE FROM
THE PROPOSED WKMG-DT CHANNEL 15 422.7 KW ERP 516 METERS HAAT
MARCH 2005

	Population	Area (km^2)
WBBH-DT service population inside the noise-limited contour	1,643,064	36098.7
Existing NTSC interference from WUSF-TV, Tampa, FL	140	12.1
DTV interference from the proposed WKMG-DT	22,290	863.8
Total Interference	22,430	875.9
Percentage new interference caused by proposed WKMG-DT	1.36%	